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From: FRANK ROLLINS
To: R5RCRA.ERB-SF, OSCALL, REMSUP
Date: 9/28/98 10:22am
Subject: Clean-up levels

There have been several changes regarding clean-up levels. Many action memo's site exceedances of removal action levels without a reference. This holds true especially for lead and PCBs. Please note that the TSCA rules changes as of 6/29/98, there is no PCB Spill Policy for the usual 50 ppm that is cited. In short you need to do a risk assessment. Talk with your supervisor.

I see a lot of Action Memos with Lead clean-up levels cited as 400 ppm residential or 1000 ppm industrial clean-up. This is also incorrect. These are screening levels only. If your site exceeds these values then you should run a site specific IEUBK model to get your site specific cleanup numbers. Work with the toxicologists in Steve Ostradka's section, they can do it for you.

The good news. Use the Hazard Evaluation Handbook; A Guide for Removal Actions, October 1997, EPA 903/B-97-006. There are tables in there that have actionable levels for many contaminants based on risk. THIS IS THE ONLY DOCUMENT THAT I AM AWARE OF THAT WOULD PROVIDE REMOVAL ACTION LEVELS. If you use this document you should reference it in the Action Memo. OSCs and Supervisors, please note that you should evaluate the sample data and be sure your decisions are representative of the site as a whole...ie, one sample exceeding action levels should not warrant the removal.

Any questions or concern please give me a call 3-2102.

CC: NACHOWICZ-LINDA, BOLEN-BILL, MUNO-WILLIAM